

FILE NO. 10416
TAMIKA N. WYCHE, ESQUIRE
LAW OFFICES OF DAVID PAUL DANIELS, LLC
2985 Yorkship Square, Suite 1A
Camden, New Jersey 08104
(856) 338-0411
TW 006502006

UNITED STATES BANKRUPTCY COURT FOR THE EASTERN DISTRICT OF PENNSYLVANIA

In Re: STEVEN E. BROWN CASE NO.: 20-11303 ELF

CHAPTER 13

CERTIFICATION IN OPPOSITION TO MOTION FOR RELIEF FROM THE AUTOMATIC STAY FILED BY PENNYMAC LOAN SERVICES, LLC

I, Steven E. Brown, Debtor, hereby certify:

- 1. I filed for protection under 11 U.S.C. Chapter 13 on March 2, 2020.
- 2. PennyMac filed a motion for relief from the automatic stay for failure to make all post-petition mortgage payments.
- I have made all post petition payments through Western Union and should be post petition current.
- 4. Currently, I can only find two of the receipts which I will attach to this opposition. The receipts show that I have made a payment in April and May, each in the amount of \$1,0000.00.
- 5. I am currently in the process of getting Western Union to send me proof of payments for the receipts that I cannot find.
- 6. Until I am able to retrieve proof of the two payments that I cannot currently find, I would like to cure the delinquent amount of \$2,019.08 over a period of 6 months.
- 7. I am also in position to make my August mortgage payment timely.
- 8. This certification is being made in an effort to resolve the issues raised by PennyMac in its motion.

I certify that the foregoing statements are true and correct. I understand that if any statement is willfully false I am subject to punishment.

Dated: July 30, 2020 Respectfully submitted,

BY: /s/ Steven E. Brown
STEVEN E. BROWN, DEBTOR